

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 V.) CRIMINAL NO. 03-10385-RGS
)
KIRK RINALDI)

ASSENTED-TO MOTION TO EXCLUDE TIME

The United States, with the assent of the defendant, moves pursuant to 18 U.S.C. § 3161(h)(1)(8) to exclude from speedy trial calculations the time from June 3, 2005, up to and including the date on which the defendant files his motion to suppress. In support of its motion, the United States says the following.

1. At a conference on May 4, 2005, the Court scheduled a further status conference for June 3, 2005, and excluded the time between May 4, 2005, and June 3, 2005.

2. Shortly before June 3, 2005, the defendant indicated that he would shortly be filing a motion to suppress, thereby negating the need for the June 3, 2005, status conference. (The status conference was cancelled in anticipation of the filing of the motion).

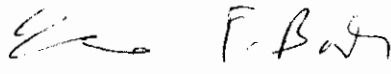
3. It is the understanding of the United States that the defendant has required some additional time (in part, to view the physical evidence) to properly prepare the motion to suppress, and that it expects to file the motion shortly.

4. The defendant assents to the motion.

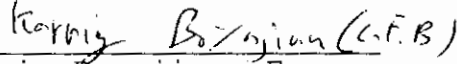
Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:



CHRISTOPHER F. BATOR
Assistant U.S. Attorney
Date: 7/8/05

Assented-To:
Kirk Rinaldi,
by his counsel,


Karnig Boyajian, Esq.
One Gateway Center
Suite 315
Newton, MA 02458

CERTIFICATE OF SERVICE

I, CHRISTOPHER F. BATOR, certify that I have served a copy of the above upon Karnig Boyajian, Esq., One Gateway Center, Suite 315, Newton, MA 02458 by first class mail.


CHRISTOPHER F. BATOR
Assistant U.S. Attorney
Date: 7/8/05